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VIA ECFS

Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Reply Comments of Meredith Corporation
GN Docket No. 12-268
WT Docket No. 12-269
AU Docket No. 14-252
MB Docket No. 15-146

Dear Madam Secretary,

It has come to our attention that several self-interested parties filed initial comments in the above-referenced proceedings denigrating the importance and viability of the Low Power Television ("LPTV") Service. Separate from these parties' selfish interests, LPTV stations serve the **public** interest – a guiding principle of the Federal Communications Commission.

First, claims that some LPTV stations provide little or no original programming miss the point. Many LPTV stations, including those utilized by Meredith in the Phoenix, Arizona market and Portland, Oregon market, serve as translators for full-power stations providing local news and information to cover areas that do not receive service from full-power television stations. These translators provide free, over-the-air vital news, weather, sports, and entertainment programming to rural and difficult-to-reach areas. Indeed, KTVK-TV's translators cover both the Navajo and Hopi reservations, which have high percentages of over-the-air viewers.

Indeed, only a few cities in the state of Arizona have a full-power television station. The rest are covered by translators. When one of KPHO-TV's or KTVK-TV's translators in these areas go down for technical reasons, the stations' front desk gets deluged with phone calls. For example, when a translator in Flagstaff recently went off air, the stations received three to five phone calls per hour and dozens of emails asking on the status of returning the translator to air.

Furthermore, the undersigned counsel has personal experience where technical difficulties caused a rural translator to go off air for less than twenty-four hours and the station General Manager received a telephone call from the FCC's Media Bureau in Washington, D.C. because that translator was so important to the community.


Second, despite claims of Silicon Valley companies, younger consumers are not shunning broadcasting. In fact, free, over-the-air broadcasting provides an opportunity for cord-cutters and cord-nevers to receive high-quality programming without paying for an expensive monthly Internet

subscription. Nielsen data confirms this trend.¹ LPTV stations enable rural and other hard-to-reach viewers the opportunity to experience the same benefits of this trend as their urban counterparts. For example, more than thirty percent of the KPTV(TV) (Fox) audience in the Portland, Oregon Designated Market Area is covered by translators, and not the full-power station.

Finally, Meredith takes issue with assertions from certain unlicensed wireless companies that LPTV stations may not be serving their communities. LPTV stations provide market-specific news, weather, and information. The same cannot be said for national news aggregators and platforms that question LPTVs' service. Without KPTV(TV)'s translators, more than 300,000 residents of Oregon would not have access to Oregon news programming over-the-air. And, of course, many of these translators directly feed cable operators and other MVPDs.

In conclusion, LPTV stations provide important local news, entertainment, sports, and other programming to viewers – young and old, cord-cutters and cord-nevers, and MVPD subscribers. The Commission must protect their ability to continue to serve their communities post-repacking and should not reserve post-repacking channels for unlicensed use.

Very truly yours,



Joshua N. Pila

¹ See, e.g., <http://www.latimes.com/entertainment/envelope/cotown/la-et-ct-cable-companies-cord-cutters-20150507-story.html> (last visited October 9, 2015).